

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW HAMPSHIRE**

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**Laurie Ortolano,**

**Plaintiff**

**V.**

**Steven Bolton and Celia Leonard**

**Defendants**

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**Civil Action No. 22-cv-00326-LM**

**Stipulation To Waive Appearance Of Keeper Of Records**

NOW COME the parties in the above-captioned matter, by and through their respective counsel, and hereby stipulate and agree as follows:

1. The parties agree to waive the appearance of the keeper of records for the purpose of authenticating the following records:
  - A. Official minutes of City of Nashua meetings/audio visual;
  - B. Records of the Board of Alderman and financial committee/ audio visual;
  - C. Assessing records;
  - D. Right-to-know requests;
  - E. Right-to-know responses;
  - F. State of NH DRA;
  - G. Board of tax and land appeals;
  - H. City of Nashua employee emails/ memos;
  - I. Nashua Police records/reports/video/audio.
2. The parties further stipulate that the records described above are admissible as records of a regularly conducted activity pursuant to Federal Rule of Evidence 803(6) and may be self-authenticated pursuant to Federal Rule of Evidence 902(11).
3. This stipulation is made solely for the purpose of admitting these specific records into evidence without requiring live testimony from the custodian or keeper of the records and shall not be construed as a waiver of any other objections, including but not limited to, objections as to relevance, privilege, or completeness.

WHEREFORE, Plaintiff respectfully requests that this Court Waive the appearance of the keeper of records.

Dated: June 4, 2025

Respectfully Submitted by,

/s/William Aivalikles  
William Aivalikles, Esq.  
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**CERTIFICATE OF SERVICE**

I certify that a copy of this filing was served via the Court's ECF filing system upon counsel of record.

Dated: June 4, 2025

/s/William Aivalikles  
William Aivalikles, Esq.